

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**UNITED STATES OF AMERICA**  
*ex rel.* Brook Jackson,

**Plaintiff,**

**v.**

**VENTAVIA RESEARCH GROUP, LLC;  
PFIZER INC.; ICON PLC,**

**Defendants.**

**CASE NO. 1:21-CV-00008-MJT**

**VENTAVIA RESEARCH GROUP, LLC’S NOTICE OF JOINDER**  
**IN PFIZER AND ICON’S REPLIES IN SUPPORT OF**  
**MOTIONS TO STAY DISCOVERY**

Under Federal Rule of Civil Procedure 10(c), Defendant Ventavia Research Group, LLC (“Ventavia”) hereby joins in and adopts by reference Pfizer’s *Reply in Support of Pfizer’s Motion to Stay Discovery* (Dkt. 52) and Icon’s *Reply in Further Support of the Motion to Stay Discovery* (Dkt. 54). Especially now that all three defendants have filed strong motions to dismiss asserting multiple grounds for dismissal that expose the fatal flaws in this case, Ventavia respectfully submits that this is an appropriate case for the Court to stay or delay all discovery unless and until it determines that Relator has stated a viable claim for relief. Discovery in the meantime would amount to the kind of impermissible and unnecessary fishing expedition that Rule 9(b) is designed to prevent. And that is especially true in light of the discovery burden that will inevitably be imposed on the parties, the government, and others; the need for the parties to carefully weigh concerns about the privacy rights of the individuals who participated in the clinical trials and to take extra steps to protect those participants’ personal and protected information; and the degree to which Relator apparently

intends to publicize developments in this litigation. On balance, Ventavia agrees that the best course of action here is to stay or delay all discovery pending the resolution of all motions to dismiss.

Respectfully submitted,

/s/ Stacy L. Brainin

Stacy L. Brainin

Texas Bar No. 02863075

Andrew W. Guthrie

Texas Bar No. 24078606

Taryn M. McDonald

Texas Bar No. 24088014

HAYNES AND BOONE, LLP

2323 Victory Avenue, Suite 700

Dallas, Texas 75219

Tel: (214) 651-5000

Fax: (214) 651-5940

stacy.brainin@haynesboone.com

andrew.guthrie@haynesboone.com

taryn.mcdonald@haynesboone.com

**COUNSEL FOR VENTAVIA**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record on June 7, 2022, pursuant to the Court's ECF filing system and the Federal Rules of Civil Procedure.

/s/ Stacy L. Brainin

Stacy L. Brainin